

EXHIBIT 3

From: [Joshua Levin](#)
To: [Silk, Jennie](#); [McMullen, Bruce](#); [Reagan, Ian](#); [Foster, Freeman](#); [McKinney, Kelsey](#); [dgodwin@gmlblaw.com](#); [bmckinney@gmlblaw.com](#); [domemphislaw@darrelloneal.com](#); [support@smitticklaw.com](#); [Robert Spence](#); [jspence@spencepartnerslaw.com](#); [cgrice](#); [ge@perrygriffin.com](#); [lgross@perrygriffin.com](#); [mcollins@gmlblaw.com](#); [tnorman@gmlblaw.com](#); [Mistie@sparkman-zummach.com](#); [bwachtel@mendelsonfirm.com](#); [Brooke Cluse](#); [dm@mendelsonfirm.com](#)
Cc: [Antonio Romanucci](#); [Stephen Weil](#); [Sarah Raisch](#); [Dana Kondos](#); [Colton Johnson Taylor](#); [Alexis Johnson](#)
Subject: RE: Kyle Coudriet Deposition and Documents
Date: Monday, March 10, 2025 5:20:50 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi Jennie,

Regarding Mr. Coudriet's deposition, we served him with Plaintiff's deposition subpoena yesterday. We will forward the proof of service. We maintain our objection to the City reserving four out of seven hours. I spoke with Mr. Coudriet on Friday about the number of hours the deposition may last, and he agreed to sit for an 8-hour deposition. We propose the following: Plaintiff will take no more than six hours and the City (and any other defendants) take the remainder (at least two hours). Please let us know if that works. We agree that the parties should be able to work this out.

Thank you for the production on Friday of documents responsive to RFP Nos. 149-151 and 155. We are reviewing.

This morning we produced documents pursuant to our responses and objections to the City's RFP Nos. 133-135. We do not plan to produce a privilege log for these RFPs at this time. To our knowledge, the only documents that may be responsive to these RFPs (specifically, RFP 135) that are privileged are correspondence between Ms. Wells' attorneys or between her attorneys and paralegals, all of which are protected by the attorney work-product doctrine and/or attorney-client privilege. It would be unduly burdensome and wholly disproportionate to the needs of the case to log communications between co-counsel and their staff, just as the City has not logged communications between the City's attorneys on its privilege log.

Thanks,
Josh

From: Silk, Jennie <jsilk@bakerdonelson.com>

Sent: Friday, March 7, 2025 7:18 PM

To: Joshua Levin <JLevin@rblaw.net>; McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ioreagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com;

bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com; support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com; tnorman@gmlblaw.com; Mistie@sparkman-zummach.com; bwachtel@mendelsonfirm.com; Brooke Cluse <Brooke@bencrump.com>; dm@mendelsonfirm.com

Cc: Antonio Romanucci <aromanucci@rblaw.net>; Stephen Weil <SWeil@rblaw.net>; Sarah Raisch <sraisch@rblaw.net>; Dana Kondos <DKondos@rblaw.net>; Colton Johnson Taylor <cjohnson@rblaw.net>; Alexis Johnson <AJohnson@rblaw.net>

Subject: RE: Kyle Coudriet Deposition and Documents

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hi Josh,

We previously produced 35 separate files responsive to RFP Nos. 149-151 and 155. This includes Mr. Coudriet's entire training and personnel files as well as body worn camera footage of the Bills incident. We are producing additional documents tonight, including body cam video for the Valles incident and additional responsive documents.

To our knowledge, today's production will complete our responses to RFP Nos. 149-151 and 155. However, to the extent we find additional responsive documents, we will make a supplemental production.

We received your responses to the City's RFPs 133-135, but we did not receive any documents or a privilege log. Please provide both by March 12th so that we can determine if we need to get the court involved.

To that end, we have cross-noticed the deposition of Coudriet reserving 4 hours of the 7 hours. I am hopeful we can come to an agreement on the time allotment amongst all the parties. We can discuss.

Thanks,

Jennie Vee Silk
Shareholder

Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
2000 First Tennessee Building
165 Madison Avenue
Memphis, TN 38103

Phone 901.577.8212
Fax 901.577.0812
JSilk@bakerdonelson.com

Baker, Donelson, Bearman, Caldwell & Berkowitz, PC represents clients across the U.S. and abroad from offices in

Alabama, Florida, Georgia, Louisiana, Maryland, Mississippi, South Carolina, Tennessee, Texas, Virginia and Washington, D.C.

From: Joshua Levin <JLevin@rblaw.net>

Sent: Wednesday, March 5, 2025 4:43 PM

To: Silk, Jennie <jsilk@bakerdonelson.com>; McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com; bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com; support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com; tnorman@gmlblaw.com; Mistie@sparkman-zummach.com; bwachtel@mendelsonfirm.com; Brooke Cluse <Brooke@bencrump.com>; dm@mendelsonfirm.com

Cc: Antonio Romanucci <aromanucci@rblaw.net>; Stephen Weil <SWeil@rblaw.net>; Sarah Raisch <sraisch@rblaw.net>; Dana Kondos <DKondos@rblaw.net>; Colton Johnson Taylor <cjohnson@rblaw.net>; Alexis Johnson <AJohnson@rblaw.net>

Subject: RE: Kyle Coudriet Deposition and Documents

Jennie,

We do not consent to the City/Chief Davis taking 4 of the 7 hours of Mr. Coudriet's deposition. This is Plaintiff's deposition. The City/Chief Davis have not issued any deposition subpoena for Mr. Coudriet. We plan to use 6 hours. If you think you will need more than 1 hour, we can see if the witness will agree to an 8-hour deposition.

As to your question about service, we are also still attempting to formally serve Mr. Coudriet. We had tried the same address as you and we are now going to try serving him at his office (Troop D, Lincoln/Uinta Counties, 555 County Road, Evanston, WY 82930). We will let you know if we get further details from Mr. Coudriet about the best day/time to serve him at his office. Note that we have attached an amended deposition subpoena for Mr. Coudriet, with the only change being that we have added his office address in the "To:" line.

Please note that Mr. Coudriet has confirmed he was able to reserve the conference room in his office for the deposition from 12pm to 8pm local time on March 24.

Regarding the City's RFPs related to Coudriet, we are aiming to serve our responses to RFPs 133-135 by Friday March 7, and the remaining RFPs in the City's 5th set by the

due date.

Lastly, I am following up on our request in my February 26 email that the City produce by March 7 all material responsive to the Plaintiff's discovery requests concerning Mr. Coudriet and the use of force incidents in which he was involved (RFPs 149-151, 155). **Please confirm whether the City will be making a supplemental production of these materials by March 7.** Below are examples of the types of documents that are responsive to these RFPs but that the City has not yet produced.

- RFP 149 – All documents related to the Marcus Bills incident.
 - Any documents related to any supervisory or other internal review of the Bills incident
- RFPs 150-151 – Documents related to training, supervision, complaints, investigations, and disciplinary proceedings involving Mr. Coudriet
 - Supervisory or other reviews, assessments, etc. of Mr. Coudriet
 - Documents related to any disciplinary investigations and findings involving Mr. Coudriet, particularly related to use of force, the reporting of use of force, and the use of BWCs
 - Civilian complaints regarding Mr. Coudriet
- RFP 155 - All documents related to the Jesus Valles incident.
 - RTRs from all involved officers (currently, only Haley's has been produced)
 - BWC or other videos from all involved officers
 - Any documents related to any supervisory or other internal review of the incident

Thanks,
Josh

From: Silk, Jennie <jsilk@bakerdonelson.com>
Sent: Tuesday, March 4, 2025 9:20 PM
To: Joshua Levin <JLevin@rblaw.net>; McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com; bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com; support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com; tnorman@gmlblaw.com;

Mistie@sparkman-zummach.com; bwachtel@mendelsonfirm.com; Brooke Cluse
<Brooke@bencrump.com>; dm@mendelsonfirm.com

Cc: Antonio Romanucci <aromanucci@rblaw.net>; Stephen Weil <SWeil@rblaw.net>; Sarah
Raisch <sraisch@rblaw.net>; Dana Kondos <DKondos@rblaw.net>; Colton Johnson Taylor
<cjohnson@rblaw.net>; Alexis Johnson <AJohnson@rblaw.net>

Subject: RE: Kyle Coudriet Deposition and Documents

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the
sender and know the content is safe.

Hi Josh,

It appears Mr. Coudriet might be evading service of our subpoena duces tecum. Please
advise how and where you served the subpoena for deposition. Better yet, since your team is
in direct communication with Mr. Coudriet, perhaps you can arrange for service of our
subpoena.

As we mentioned earlier, we will not move forward with this deposition unless and until we
receive the subpoenaed documents from him. We are also awaiting the documents
responsive to our Requests for Production related to Mr. Coudriet (and all the others). Please
let us know when we can expect those documents.

Should the deposition go forward on March 24, or whenever it is eventually scheduled, the
City and Chief Davis reserve 4 hours of the 7 hours.

Thanks,

Jennie Vee Silk

Phone 901.577.8212

From: Joshua Levin <JLevin@rblaw.net>

Sent: Sunday, March 2, 2025 10:35 AM

To: Silk, Jennie <jsilk@bakerdonelson.com>; McMullen, Bruce
<bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>;
Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey
<kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com;
bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com;
support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>;
jspence@spencepartnerslaw.com; cgrice <cgrice@eflawgroup.com>;
ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com;
tnorman@gmlblaw.com; Mistie@sparkman-zummach.com;
bwachtel@mendelsonfirm.com; Brooke Cluse <Brooke@bencrump.com>;

dm@mendelsonfirm.com

Cc: Antonio Romanucci <aromanucci@rblaw.net>; Stephen Weil <SWeil@rblaw.net>; Sarah Raisch <sraisch@rblaw.net>; Dana Kondos <DKondos@rblaw.net>; Colton Johnson Taylor <cjohnson@rblaw.net>; Alexis Johnson <AJohnson@rblaw.net>

Subject: RE: Kyle Coudriet Deposition and Documents

Jennie,

Plaintiff does not object to the requests in the City's document subpoena to Mr. Coudriet. Pursuant to L.R. 26.1(c), please provide us with copies of any documents Mr. Coudriet produces. Please share any produced documents the same day the City receives them.

Thank you,
Josh

From: Joshua Levin

Sent: Friday, February 28, 2025 9:54 AM

To: Silk, Jennie <jsilk@bakerdonelson.com>; McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com; bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com; support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com; tnorman@gmlblaw.com; Mistie@sparkman-zummach.com; bwachtel@mendelsonfirm.com; Brooke Cluse <Brooke@bencrump.com>; dm@mendelsonfirm.com

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Subject: RE: Kyle Coudriet Deposition and Documents

We will let you know by Monday morning if we have any objections to the City's subpoena to Mr. Coudriet.

From: Silk, Jennie <jsilk@bakerdonelson.com>

Sent: Friday, February 28, 2025 9:46 AM

To: Joshua Levin <JLevin@rblaw.net>; McMullen, Bruce

<bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com; bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com; support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com; tnorman@gmlblaw.com; Mistie@sparkman-zummach.com; bwachtel@mendelsonfirm.com; Brooke Cluse <Brooke@bencrump.com>; dm@mendelsonfirm.com

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Subject: Re: Kyle Coudriet Deposition and Documents

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

We will need some of that 7 hours, Josh. I imagine the other parties will, too.

Also, if you plan to object to anything in our subpoena you need to let us know today so we can consult and file the appropriate motion, if necessary. We do not want another situation where we travel to the other side of the country with a motion pending.

From: Joshua Levin <JLevin@rblaw.net>

Sent: Friday, February 28, 2025 9:36:37 AM

To: Silk, Jennie <jsilk@bakerdonelson.com>; McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com <dgodwin@gmlblaw.com>; bmckinney@gmlblaw.com <bmckinney@gmlblaw.com>; domemphislaw@darrelloneal.com <domemphislaw@darrelloneal.com>; support@smitticklaw.com <support@smitticklaw.com>; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com <jspence@spencepartnerslaw.com>; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com <ge@perrygriffin.com>; lgross@perrygriffin.com <lgross@perrygriffin.com>; mcollins@gmlblaw.com <mcollins@gmlblaw.com>; tnorman@gmlblaw.com <tnorman@gmlblaw.com>; Mistie@sparkman-zummach.com <Mistie@sparkman-zummach.com>; bwachtel@mendelsonfirm.com <bwachtel@mendelsonfirm.com>; Brooke Cluse <Brooke@bencrump.com>;

dm@mendelsonfirm.com <dm@mendelsonfirm.com>

Cc: Antonio Romanucci <aromanucci@rblaw.net>; Stephen Weil <SWeil@rblaw.net>; Sarah Raisch <sraisch@rblaw.net>; Dana Kondos <DKondos@rblaw.net>; Colton Johnson Taylor <cjohnson@rblaw.net>; Alexis Johnson <AJohnson@rblaw.net>

Subject: RE: Kyle Coudriet Deposition and Documents

We will ask Mr. Coudriet if that works for him. Regardless of when we start, we reserve all 7 hours.

From: Silk, Jennie <jsilk@bakerdonelson.com>

Sent: Friday, February 28, 2025 9:16 AM

To: Joshua Levin <JLevin@rblaw.net>; McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com; bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com; support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com; tnorman@gmlblaw.com; Mistie@sparkman-zummach.com; bwachtel@mendelsonfirm.com; Brooke Cluse <Brooke@bencrump.com>; dm@mendelsonfirm.com

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Subject: Re: Kyle Coudriet Deposition and Documents

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Can we start in the afternoon so we don't have to fly in on Sunday?

From: Joshua Levin <JLevin@rblaw.net>

Sent: Friday, February 28, 2025 8:15:49 AM

To: Silk, Jennie <jsilk@bakerdonelson.com>; McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com <dgodwin@gmlblaw.com>; bmckinney@gmlblaw.com <bmckinney@gmlblaw.com>; domemphislaw@darrelloneal.com <domemphislaw@darrelloneal.com>;

support@smitticklaw.com <support@smitticklaw.com>; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com <jspence@spencepartnerslaw.com>; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com <ge@perrygriffin.com>; lgross@perrygriffin.com <lgross@perrygriffin.com>; mcollins@gmlblaw.com <mcollins@gmlblaw.com>; tnorman@gmlblaw.com <tnorman@gmlblaw.com>; Mistie@sparkman-zummach.com <Mistie@sparkman-zummach.com>; bwachtel@mendelsonfirm.com <bwachtel@mendelsonfirm.com>; Brooke Cluse <Brooke@bencrump.com>; dm@mendelsonfirm.com <dm@mendelsonfirm.com>

Cc: Antonio Romanucci <aromanucci@rblaw.net>; Stephen Weil <SWeil@rblaw.net>; Sarah Raisch <sraisch@rblaw.net>; Dana Kondos <DKondos@rblaw.net>; Colton Johnson Taylor <cjohnson@rblaw.net>; Alexis Johnson <AJohnson@rblaw.net>

Subject: RE: Kyle Coudriet Deposition and Documents

All, Hearing no date conflicts, we are going to proceed with Mr. Coudriet's deposition on 3/24 in Evanston, Wyoming. There will be a zoom link for anyone attending virtually. Subpoena to follow.

Thanks,
Josh

From: Joshua Levin

Sent: Wednesday, February 26, 2025 3:34 PM

To: Silk, Jennie <jsilk@bakerdonelson.com>; McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com; bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com; support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com; tnorman@gmlblaw.com; Mistie@sparkman-zummach.com; bwachtel@mendelsonfirm.com; Brooke Cluse <Brooke@bencrump.com>; dm@mendelsonfirm.com

Cc: Antonio Romanucci <aromanucci@rblaw.net>; Stephen Weil <SWeil@rblaw.net>; Sarah Raisch <sraisch@rblaw.net>; Dana Kondos <DKondos@rblaw.net>; Colton Johnson Taylor <cjohnson@rblaw.net>; Alexis Johnson <AJohnson@rblaw.net>

Subject: Kyle Coudriet Deposition and Documents

Jennie,

We are working to reschedule the deposition of Mr. Coudriet. **All counsel should hold March 24 and March 31 for his deposition.** We know that counsel for the City is available for depositions on those dates, as indicated in your February 24 email.

Any objection to proceeding with his deposition on March 24 or March 31 is not well founded. The City has known of Plaintiff's belief that Mr. Coudriet has relevant evidence since Plaintiff's November 30, 2024 motion for leave to file amended complaint. In that filing, we explained that Mr. Coudriet (and James Harvey) "offered the most revealing *Monell* testimony" in the *Bean* trial, specifically, because their testimony "reveal[ed] the existence of the 'run tax' and the code of silence." (ECF 248 at 6-7). Our February 17 email additionally notified you "in writing" of our belief that Mr. Coudriet has relevant information, which is all that Rule 26(e)(1)(A) requires.

If the City intends to serve a subpoena duces tecum on Mr. Coudriet, the City will have had ample time to receive responsive documents by March 24 or 31. More to the point, there is no reason to think that Mr. Coudriet has any relevant documents that are not already in the City's possession. He is a former SCORPION officer. Any relevant materials—use of force reports and reviews, BWC videos, etc. related to his employment at MPD—are already in the City's possession. Likewise, Plaintiff does not possess any documents related to Mr. Coudriet other than what the City has produced to us to date, his *Bean* testimony and news articles regarding the same, and a small number of emails we have exchanged with him to schedule his deposition. We will promptly serve our responses to the City's RFP Nos. 133–35 to that effect.

With regard to Plaintiff's discovery requests concerning Mr. Coudriet and the use of force incidents in which he was involved (RFPs 149-151, 155), we ask that the City produce all responsive material by March 7. It has been three months since we issued those discovery requests.

Thank you,
Josh

From: Silk, Jennie <jsilk@bakerdonelson.com>
Sent: Friday, February 21, 2025 5:23 PM
To: Sarah Raisch <sraisch@rblaw.net>; McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com; bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com; support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>;

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ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com;
tnorman@gmlblaw.com; Mistie@sparkman-zummach.com;
bwachtel@mendelsonfirm.com; Brooke Cluse <Brooke@bencrump.com>;
dm@mendelsonfirm.com

Cc: Antonio Romanucci <aromanucci@rblaw.net>; Joshua Levin <JLevin@rblaw.net>;
Stephen Weil <SWeil@rblaw.net>; Dana Kondos <DKondos@rblaw.net>; Colton
Johnson Taylor <cjohnson@rblaw.net>; Alexis Johnson <AJohnson@rblaw.net>

Subject: RE: March 17 or March 18 Deposition

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize
the sender and know the content is safe.

Hi Sarah,

We are unable to attend a deposition in Wyoming on March 17 or 18. Bruce and I have a hearing in the matter In Re: AME Church Employee Retirement Fund Litigation, Case No. 1:22-md-3035 at 10:00 a.m. on March 18 in Jackson, Tennessee.

We also note that Plaintiff's Initial and Supplemental Disclosures do not list Mr. Coudriet as a witness. Likewise, Plaintiff's response to the City's Interrogatory No. 1, which asks Plaintiff to identify all persons with knowledge regarding the matters set forth in Plaintiff's Complaint, simply refers to Plaintiff's Initial and Supplemental Disclosures, which do not list Mr. Coudriet. Until your February 17 email, the City had no way of knowing that Plaintiff intended to depose Mr. Coudriet, or that Plaintiff believed that he had any personal knowledge relevant to Plaintiff's claims. As soon as the City became aware of Plaintiff's belief that Mr. Coudriet possesses relevant knowledge, the City issued related discovery requests, and we intend to serve a Subpoena Duces Tecum on Mr. Coudriet next week.

Accordingly, we object to this deposition moving forward until Mr. Coudriet responds to the City's forthcoming subpoena duces tecum, and until Plaintiff has fully responded to RFP Nos. 133–35 contained in the City's Fifth Set of RFPs propounded to Plaintiff on February 18, 2025 (and we have had at least five days to review). We are hopeful that we can agree upon a date for the deposition that accommodates for any objections or motion practice related to the discovery requests. Otherwise, Mr. Coudriet's deposition will need to be re-opened after the discovery and/or motion practice is resolved; and that is not in anyone's best interest.

Please let us know.

Thanks,

Jennie Vee Silk

Phone 901.577.8212

From: Sarah Raisch <sraisch@rblaw.net>**Sent:** Monday, February 17, 2025 5:02 PM

To: McMullen, Bruce <bmcmullen@bakerdonelson.com>; Reagan, Ian <ireagan@bakerdonelson.com>; Foster, Freeman <ffoster@bakerdonelson.com>; Silk, Jennie <jsilk@bakerdonelson.com>; Thompson, Theresa <tthompson@bakerdonelson.com>; McKinney, Kelsey <kmckinney@bakerdonelson.com>; dgodwin@gmlblaw.com; bmckinney@gmlblaw.com; domemphislaw@darrelloneal.com; support@smitticklaw.com; Robert Spence <rspence@spencepartnerslaw.com>; jspence@spencepartnerslaw.com; cgrice <cgrice@eflawgroup.com>; ge@perrygriffin.com; lgross@perrygriffin.com; mcollins@gmlblaw.com; tnorman@gmlblaw.com; Mistie@sparkman-zummach.com; bwachtel@mendelsonfirm.com; Brooke Cluse <Brooke@bencrump.com>; dm@mendelsonfirm.com

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Subject: March 17 or March 18 Deposition

Good Morning,

We would like to set the deposition of former Memphis Police Department Officer Kyle Coudriet .He is available on **either March 17 or March 18**. It will take place in person in Evanston, Wyoming but there will be a zoom option as well.

Please let me know if you have a strong preference for one of those dates, and if not then **please hold both dates**. We will get the notice out early next week.

Thank you,

Sarah M. Raisch
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